UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Habitat Conservation Branch
Water Street
Woods Hole, MA 02543

April 6, 1987 F/NER741:SMM

Mr. Frank Ciavatierri
U.S. Environmental Protection Agency
Waste Management Division
HRS - 1903
J.F.K. Federal Building
Boston, MA 02203

Dear Mr. Ciavatierri:

This is in reference to the Corps' evaluation of alternative locations for the New Bedford Harbor pilot study's confined disposal facility (CDF). We have reviewed the document and offer the following comments:

One major drawback of the evaluation is that it focuses only on the relative costs and engineering feasibility of building each alternative and does not address the environmental and social factors that affect each site. It is difficult to assess if any of these sites would provide a better potential to limit contaminant releases to other portions of the estuary; this is, in our opinion, an important consideration. We object to the selection of a disposal site based only on engineering and cost analyses, and trust that EPA will consider environmental factors (e.g., effects on productive aquatic habitat and ability to limit contaminant dispersion) when choosing the CDF site.

Location E appears to provide the most environmentally acceptable alternative for the CDF; therefore, we favor its selection. The only major drawback cited in the report is its inability, as currently designed, to accomodate more than 6000 cubic yards of dredged material. The option of excavating below existing ground level, so that this site could accomodate a greater volume of dredged material, should be pursued. Location F, which also limits aquatic habitat alterations, would be our second choice if expanding location E proves infeasible. Another benefit associated with these locations is that it may not be necessary to restore these areas to existing conditions since they are primarily undeveloped upland sites.

Location D, sited in the salt marsh wetlands on the eastern side of the estuary, presents the least acceptable location from an aquatic habitat perspective. We recommend that this location not be given further consideration since it entails an avoidable alteration of productive salt marsh wetlands. The overall project costs for this alternative should include the costs

associated with restoring the wetland or compensating for any permanent wetland loss.

The Corps indicates that due to CDF siting difficulties, and their concern that field monitoring may be hindered by winter ice conditions, dredging would likely be delayed until March and April. The original pilot study plan called for dredging in late fall/early winter. This time frame is preferable for dredging because it coincides with a period of lower biological activity for most resident aquatic organisms (winter flounder is the only notable exception), and therefore should limit PCB/heavy metal uptake by aquatic plants and animals. Another benefit of the late fall/early winter time frame is that migratory species, such as alewives, blueback herring, bluefish, striped bass, etc., will not be present during dredging operations. The proposed spring dredging conflicts with blueback herring (Alosa aestivalis) and alewife (Alosa pseudoharengus) migrations into the Acushnet River Estuary. Another concern is that any unplanned construction or dredging delays will push the project time schedule into late spring and summer. We recommend that the timing of the pilot study be reconsidered so as to minimize the potential for resuspended contaminants to be bioaccumulated in aquatic organisms.

We appreciate the opportunity to comment on this portion of the pilot study proposal. For further coordination, please contact Susan Mello at FTS 840-1323.

Sincerely,

Susan M. Mello

Thomas E. Bigford
Branch Chief

cc: Alan Randall, COE
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